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## CIRCUIT COURT

FOR PRINCE GEORGE'S COUNTY

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BARRY C. HOBSON,

Plaintiff,

v.

Case No.

LOCAL 689, AMALGAMATE TRANSIT

CAL21-14493

UNION, AFL-CIO,

Defendant.  

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## DEPOSITION OF

TONYA JACKSON

DATE: Monday, May 1, 2023

TIME: 10:26 a.m.

LOCATION: Remote Proceeding

20 South Charles Street, Suite 901

Baltimore, MD 21201

REPORTED BY: Richard Livengood, Notary Public

JOB NO.: 5820913



Page 30	Page 32
<p>1 A I've never seen him a day in my life.</p> <p>2 Q Prior to being hired.</p> <p>3 A Prior to being hired.</p> <p>4 Q Okay. When you were hired at THW, how often</p> <p>5 would you interact with Mr. Jackson?</p> <p>6 A Mr. Jackson and I interacted a lot -- often,</p> <p>7 very often. I would say we interacted maybe two to</p> <p>8 three times a week.</p> <p>9 Q And would that be in person or?</p> <p>10 A It would be in person. It would be over the</p> <p>11 phone. It would just be various interactions.</p> <p>12 Q Okay. You mentioned that you raised</p> <p>13 concerns about what was going on at THW. Did any of</p> <p>14 those concerns involve Mr. Barry Hobson?</p> <p>15 A Yes, they did.</p> <p>16 Q Okay. Can you tell me when is the first</p> <p>17 time you raised concerns regarding what you saw at THW</p> <p>18 as it relates to Mr. Hobson?</p> <p>19 A The first time is when -- so in March, I can</p> <p>20 tell you the exact date, March 3rd. March 3rd -- it</p> <p>21 may be March 7th, but no it's actually March 2nd.</p>	<p>1 up here so.</p> <p>2 Q You can hold onto that.</p> <p>3 A Okay.</p> <p>4 Q Can I see that pen?</p> <p>5 A Yes.</p> <p>6 MR. STAFFORD: So let the record</p> <p>7 reflect, Ms. Jackson has indicated that the CFO is --</p> <p>8 she's drawn a circle around that person's name and put</p> <p>9 CFO next to it -- next to her.</p> <p>10 BY MR. STAFFORD:</p> <p>11 Q Can you give me her name?</p> <p>12 A Crystal Michelle Long.</p> <p>13 Q Can you spell that?</p> <p>14 A C-R-Y-S-T-A-L, M-I-C-H-E-L-L-E, Long,</p> <p>15 L-O-N-G.</p> <p>16 Q Okay. Sorry, keep going. I'm sorry.</p> <p>17 A So Crystal Michelle Long and myself as well</p> <p>18 as Tonya Billups, who is a retired employee, we went</p> <p>19 to meet with him because we felt that there was some</p> <p>20 financial issues going on that we were unaware of, and</p> <p>21 we wanted them to come in and do a forensic audit.</p>
Page 31	Page 33
<p>1 March 2nd --</p> <p>2 Q Of what year?</p> <p>3 A Of 2022.</p> <p>4 Q Okay.</p> <p>5 A The chief financial officer and I -- we went</p> <p>6 to meet with him because we felt that some things was</p> <p>7 going on financially. Chief financial officer Crystal</p> <p>8 Long and myself --</p> <p>9 Q Let me do this. I'm going to show you what</p> <p>10 I'm marking as Exhibit 2, and this way we can sort of</p> <p>11 all be on the same page.</p> <p>12 (Exhibit 2 was marked for</p> <p>13 identification.)</p> <p>14 A Okay.</p> <p>15 Q Exhibit 2 is a printout of the THW website.</p> <p>16 Can you circle for me the CFO that you're referencing?</p> <p>17 A Okay.</p> <p>18 Q And then can you write next to her CFO?</p> <p>19 A Okay.</p> <p>20 Q And draw a line to it, if you don't mind?</p> <p>21 A Okay. And I don't think the other person is</p>	<p>1 So when we asked them to come in and do a</p> <p>2 forensic audit on that March 2nd, I think that's the</p> <p>3 date -- March 2nd.</p> <p>4 The next day on March 3rd, we -- somehow the</p> <p>5 contract was signed with the previous agency. And so</p> <p>6 -- and then on March 4th, Barry Hopkins [sic], he did</p> <p>7 a post on Facebook -- a group. And so I was unaware</p> <p>8 of how this guy knew me. Now, he had done a post</p> <p>9 prior when I first started about, you know, being</p> <p>10 hired, about you know my salary and I just didn't know</p> <p>11 what was going on in my office.</p> <p>12 And so prior to me coming, we had an</p> <p>13 executive director or acting as executive director, I</p> <p>14 don't know what she was. I know at one point the</p> <p>15 board said she was acting executive director. At one</p> <p>16 point, they said she was not. I really don't know</p> <p>17 what her role was, but I know when I started -- her</p> <p>18 name was Sonya Long. When I started -- Sonya Long. I</p> <p>19 met her one day and she was out. She went out on</p> <p>20 FMLA.</p> <p>21 And so a lot of my staff, not a lot of my</p>

<p style="text-align: right;">Page 34</p> <p>1 staff, certain staff members they would relay  2 everything that was happening in the office because of  3 Barry and the blog followers. So they instilled this  4 fear in us that, you know, Barry and certain people  5 were doing certain things and it happened -- the  6 coincidence happened after we went to go see an  7 auditor.  8 And so you know, because we're like, okay,  9 what are they trying to stop us from uncovering  10 because of everything that was going on. And so at  11 that time, everything that would happen, they were  12 sort of relaying back to Barry or say you know Barry  13 may have had something to do with it or somebody in  14 our office was friends with Barry or they was doing it  15 on his behalf.  16 So me not knowing Barry, you know, I'm  17 new -- I've been in so many professional environments,  18 I never encountered anything of such. I didn't know  19 what to think of it.  20 So when they would just say everything was  21 about Barry or the lady Sonya, Crystal made -- she</p>	<p style="text-align: right;">Page 36</p> <p>1 That Barry has a condition that Sonya tried  2 to get him approved for and Sonya signed off on the  3 records. And I said stop what you're doing. Do you  4 mean to tell me that you guys went into his records?  5 I said with everything that's going on, I hope and  6 pray, and those were my words exactly, that you did  7 not access this man's records. And I said you're  8 setting us up for a case. I said I'm a nurse first.  9 I said I am not going to put my nursing license on the  10 line for anybody.  11 And they said no, no. We're just saying  12 that she tried to sign off on this condition and she  13 knows that he does not qualify for it.  14 I said why are you in the records. Crystal  15 stopped and asked. And I said why are you in the  16 records? And they said we're not in the records. I  17 said you are -- you are. You are in the records if  18 you're able to tell me that this man has a condition.  19 I don't know Barry. I said Barry was not here when I  20 started working here. I said all I know is this man  21 on the blog that keeps talking about me and I have no</p>
<p style="text-align: right;">Page 35</p> <p>1 said stop using Sonya's name. She's no longer here.  2 We have to be accountable for what we're being  3 accountable for, and I said, I don't know if our staff  4 is telling Barry these different things about us or  5 you know and I went and put it all on Sonya.  6 I had a staff. Bertha Villatoro [ph],  7 that's the one that has a romantic relationship with  8 Mr. Jackson as well as Tonya Billups and Kiara  9 Richardson, and Jackie Wilson; they all stated that  10 Sonya and Barry were personal friends. They came to  11 my office. And when they was telling me why Barry was  12 posting about me, they said you have to realize that  13 he has a close relationship with Sonya.  14 And I said, well, what does that have to do  15 with anything. Sonya is no longer here. And they  16 said she's trying to cover up and get back in the  17 records because on the life insurance policy, she --  18 Barry has a condition, and I, you know -- other people  19 -- I know we took oaths, but you know, I'm a nurse.  20 So you know I've got to protect my license and that's  21 why this is so strong to me.</p>	<p style="text-align: right;">Page 37</p> <p>1 -- I don't understand why. I said please do not do  2 this on -- do not go back in his records. And that  3 was like -- they just walked away.  4 But the thing about it is, just don't take  5 my word for it. It was a -- everybody -- you can  6 interview every single person in the office. They  7 will tell you the exact single thing that I'm saying.  8 Q You gave me a lot to unpack.  9 A I know. I'm sorry.  10 Q No, that's fine. All right.  11 At THW, who did you raise concerns with  12 about potentially unauthorized access of Mr. Hobson's  13 records?  14 A I told Mr. Jackson about it.  15 Q Raymond Jackson.  16 A Yes. I told -- and I told him about it  17 throughout. Because at one time too -- and I can give  18 you the exact day as well. It's one day -- so I  19 brought [ph] it throughout. But one time in  20 particular where it just started coming back up was  21 one day we had open enrollment. We had open</p>



<p style="text-align: right;">Page 42</p> <p>1 And I'm going, to be honest, the way -- we</p> <p>2 was scared. It was -- you know, I know this has</p> <p>3 nothing to do with it, but we was scared at some of</p> <p>4 the things that was happening. We had someone to make</p> <p>5 an -- with an A and an X on everybody's door in the</p> <p>6 office. We had someone at my -- Bertha came in and</p> <p>7 she told me that someone told her that she and I</p> <p>8 needed to make sure that we are escorted out to our</p> <p>9 car. She said that. And I said why? I had been</p> <p>10 staying here late all night long, you know, why do I</p> <p>11 need to be escorted out to my car? She said somebody</p> <p>12 is concerned. She wouldn't tell me who this somebody</p> <p>13 was, but she said somebody is concerned about my</p> <p>14 safety.</p> <p>15 She went on to tell Dwayne Johnson, who is</p> <p>16 our housekeeper. He had wrote a statement because I</p> <p>17 took it to court when I put a subpoena order against</p> <p>18 Barry. She went on to say that -- to Dwayne she said</p> <p>19 please make sure you protect Ms. Jackson because</p> <p>20 someone said that you know she needs to be escorted to</p> <p>21 her car.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q Did you ever send an email to him about</p> <p>2 that?</p> <p>3 A No, I did not.</p> <p>4 As a nurse -- because number one as a nurse,</p> <p>5 I didn't want to put that in writing. I did not -- I</p> <p>6 just told them to stop it and I did not want to put</p> <p>7 that in writing because of everything that was going</p> <p>8 on. No, I did not because he's the secretary of the</p> <p>9 board too, you know. And so I was like -- and I</p> <p>10 didn't know the connection. I did not know any of</p> <p>11 this connection or anything until later on I found out</p> <p>12 the connection.</p> <p>13 Q When you say the "connection," are you</p> <p>14 talking about the relationship between Mr. Raymond</p> <p>15 Jackson and Bertha Villatoro?</p> <p>16 A So it was a rumor, but I really found out</p> <p>17 about the relationship right there in March, you know.</p> <p>18 It was rumored that they was together, but in March --</p> <p>19 and Sonya told me on my first day. And I was like I</p> <p>20 don't know because I never would see them together,</p> <p>21 but then in March, I started really seeing them</p>
<p style="text-align: right;">Page 43</p> <p>1 I have been there since December, and this</p> <p>2 is March. I go to my car that same day, somebody is</p> <p>3 at my car crouching down at my car the day she tells</p> <p>4 me. And Dwayne is there. So you know I'm like</p> <p>5 Dwayne. I have been to my car a million times. You</p> <p>6 don't have to, you know, protect me. As soon as he</p> <p>7 goes back in, all I can do is scream his name. So</p> <p>8 this fear was instilled in me. This fear was</p> <p>9 instilled in the CFO. This fear was instilled in all</p> <p>10 of our staff. And the people who was there, all they</p> <p>11 would say is Barry or Sonya. So that fear was</p> <p>12 instilled in me. I was scared.</p> <p>13 And people will tell you and they have told</p> <p>14 Barry, I guess, that we were truly scared of what was</p> <p>15 going on from what was said to us, you know, said to</p> <p>16 us. And the things that was happening.</p> <p>17 Q Got you. And so in March of 2022, you said</p> <p>18 you told Mr. Jackson, Mr. Raymond Jackson, that</p> <p>19 someone unauthorized is accessing Mr. Hobson's medical</p> <p>20 records without authorization?</p> <p>21 A I sure did. Yes, I did.</p>	<p style="text-align: right;">Page 45</p> <p>1 together. And that's when Mr. Jackson confirmed the</p> <p>2 relationship as well as Bertha confirmed their</p> <p>3 romantic relationship.</p> <p>4 Q In Exhibit 2, can you take this pen and</p> <p>5 circle Bertha Villatoro? And then can you -- yeah and</p> <p>6 do an arrow and write her name out there.</p> <p>7 MR. STAFFORD: And let the record</p> <p>8 reflect that Ms. Jackson circled Ms. Bertha Villatoro</p> <p>9 and has put her name next to -- to her.</p> <p>10 BY MR. STAFFORD:</p> <p>11 Q You told Mr. Jackson in March of 2022</p> <p>12 someone -- did you say explicitly Bertha Villatoro was</p> <p>13 unauthorized --</p> <p>14 A I said -- I said --</p> <p>15 Q One second. One second.</p> <p>16 When you spoke to Mr. Jackson in March of</p> <p>17 2022, did you explicitly say Bertha Villatoro is</p> <p>18 accessing Mr. Hobson's records without authorization?</p> <p>19 A Yes, I did.</p> <p>20 Q Okay. Who else was present when you told</p> <p>21 him that?</p>

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<p>1 I don't know but normally we don't because, you know,</p> <p>2 of the legal implications around the executive</p> <p>3 session.</p> <p>4 Q Was there any investigation to your</p> <p>5 knowledge into the unauthorized access of Mr. Hobson's</p> <p>6 records?</p> <p>7 A Well, the board of trustees stated that they</p> <p>8 was going to do an investigation into the chaotic</p> <p>9 environment and that's what -- because when I put</p> <p>10 everything out there in writing, that's what led up to</p> <p>11 my termination on March 7th of this year.</p> <p>12 But to date, I don't think the investigation</p> <p>13 has been concluded. And I don't want to say any</p> <p>14 hearsay that I heard so.</p> <p>15 Q Understood. At any point in time, did</p> <p>16 Bertha Villatoro admit that she accessed Mr. Hobson's</p> <p>17 records?</p> <p>18 A Oh, she has the form, yeah. She said that</p> <p>19 she went into the form but she stated that the reason</p> <p>20 why they went into it is because they wanted to show</p> <p>21 that Sonya, who was the executive director before me,</p>	<p>1 Q And so I'm trying to draw an analogy because</p> <p>2 again I'm not in the healthcare space like you've</p> <p>3 been, but I want to understand.</p> <p>4 THW, are you all sort of like the CareFirst</p> <p>5 where you help sort of get all the information</p> <p>6 together and figure out who's eligible for certain</p> <p>7 coverages and then work with a CareFirst to get that</p> <p>8 coverage? What exactly do you do?</p> <p>9 A We're a third-party administrator. So</p> <p>10 basically, although we have CareFirst, we have Kaiser</p> <p>11 and we have Cigna. We administer the plan. So we</p> <p>12 stand in as an insurer, so we're considered -- we are</p> <p>13 a benefits -- a health and welfare plan. We do</p> <p>14 administer benefits.</p> <p>15 Q Okay. We talked about the discussion</p> <p>16 briefly you had with Mr. Jackson in March of 2022.</p> <p>17 How long did that discussion last?</p> <p>18 A I do not recall.</p> <p>19 Q The subsequent discussions you've had with</p> <p>20 Mr. Jackson about unauthorized access of Mr. Hobson's</p> <p>21 records, how long did those discussions last on</p>
Page 51	Page 53
<p>1 was doing something that she was not supposed to do.</p> <p>2 Oh, yes.</p> <p>3 Q Did Bertha Villatoro ever mention the exact</p> <p>4 condition that she found out Mr. Hobson had?</p> <p>5 A Yes, HIV.</p> <p>6 Q All right. Let me ask you this because I</p> <p>7 want to understand a little bit more about what</p> <p>8 information TEHW has.</p> <p>9 Does THW have medical records of the</p> <p>10 employees that are part of the Local 689 Union?</p> <p>11 A Not necessarily medical records, but what we</p> <p>12 have is if they completed an application and it is</p> <p>13 considered a medical record. It is considered</p> <p>14 HIPAA-protected information. We have forms. And so</p> <p>15 that's what we have there.</p> <p>16 If they have short-term disability or</p> <p>17 long-term disability, we do have it. The ICD 9 codes</p> <p>18 or 10 codes that fit that, so we will have that</p> <p>19 information.</p> <p>20 Q You previously worked at CareFirst.</p> <p>21 A Yes.</p>	<p>1 average, do you know?</p> <p>2 A On average and I honestly do not recall, but</p> <p>3 I mean, because we were talking about so many</p> <p>4 different things pertaining to everything, so I would</p> <p>5 say if we were just talking about Mr. Jackson -- Mr.</p> <p>6 Barry probably like three minutes, two -- you know</p> <p>7 four minutes, five. I really don't recall. And I</p> <p>8 don't want to go on record saying a time period and</p> <p>9 it's not that.</p> <p>10 Q Understood. Walk me through what Mr.</p> <p>11 Jackson said during those meetings about again solely</p> <p>12 about Mr. Hobson and folks' unauthorized access of his</p> <p>13 information if you can recall.</p> <p>14 A No, I can recall. So one of the things that</p> <p>15 really concerned me about when I told Mr. Jackson</p> <p>16 about it -- I also told Mr. Jackson about what -- it's</p> <p>17 because when the staff came to me -- one time in</p> <p>18 particular when Bertha came to me about Sonya doing</p> <p>19 this too -- at Barry's records.</p> <p>20 She also -- they also -- Kiara Richardson</p> <p>21 also came to me to tell me about another employee, who</p>



<p style="text-align: right;">Page 54</p> <p>1 we had rehired, Brandon, coming to get reemployed.</p> <p>2 And so Kiara was saying, you know, because</p> <p>3 Kiara was one of the ones that had a restraining order</p> <p>4 out on Barry as well, she was saying that Brandon --</p> <p>5 Barry was asking Brandon for his private parts or</p> <p>6 something, so unprofessional.</p> <p>7 So when I told Mr. Jackson about it, Mr.</p> <p>8 Jackson wanted to know -- he was like -- he wanted to</p> <p>9 talk to Kiara because he wanted to talk to Brandon</p> <p>10 because he was trying to get that information so he</p> <p>11 could show it and present it to Barry's husband.</p> <p>12 So when I told him I said we can't do this,</p> <p>13 like, if we're going to fight Barry, let's fight Barry</p> <p>14 fair and square. I was like I will take Barry to</p> <p>15 court and I'm going to put a restraining order out on</p> <p>16 him.</p> <p>17 And Mr. Jackson even told me, he said, I</p> <p>18 don't think you're going to win. Barry is a very</p> <p>19 smart person. You better know what you're doing when</p> <p>20 you taking him to court.</p> <p>21 In my mind, because everything was happening</p>	<p style="text-align: right;">Page 56</p> <p>1 is this man, you know, doing this, and he said because</p> <p>2 I terminated him. But he said he was acting on behalf</p> <p>3 of him versus being, you know, the chief of staff.</p> <p>4 Q Got it. So you said Mr. Jackson was saying</p> <p>5 that Mr. Hobson was acting outside of his power --</p> <p>6 A Yes.</p> <p>7 Q -- and authority.</p> <p>8 A As if he had the power.</p> <p>9 Q Did he ever give any other reason why he</p> <p>10 terminated Mr. Hobson?</p> <p>11 A No, he did not.</p> <p>12 Q Going back to the records that THW has</p> <p>13 applications shall we say.</p> <p>14 A Mm-hmm.</p> <p>15 Q Are those stored electronically?</p> <p>16 A Well, they are not. And we was trying to</p> <p>17 scan them in to be -- they are. They're supposed to</p> <p>18 be scanned electronically, but we were actually going</p> <p>19 through a process and making sure everything was</p> <p>20 scanned into our system. We have Vasion [ph] system</p> <p>21 and we have Decusoft.</p>
<p style="text-align: right;">Page 55</p> <p>1 to me, there was no way in my mind that I felt we</p> <p>2 would ever lose because of everything that had been</p> <p>3 planted that you know this is this man doing all this.</p> <p>4 I didn't want to do that -- stuff. First of all, I'm</p> <p>5 a nurse. And my thing -- I'm a nurse. I'm a mother</p> <p>6 of three. I set an example for my kids. And I'm a</p> <p>7 steward of French George's County and I don't want to</p> <p>8 do anything outside of that character.</p> <p>9 And so I was not going to get involved in</p> <p>10 none of that nonsense because I'm a professional. I'm</p> <p>11 a mother and I was not going to deal with that.</p> <p>12 Q During your discussions with Mr. Jackson</p> <p>13 about Mr. Hobson, did Mr. Jackson ever say why he</p> <p>14 terminated Mr. Hobson?</p> <p>15 A He said that Mr. Hobson they said that he</p> <p>16 had a man crush on him. He also stated that Mr.</p> <p>17 Hopkins [sic] was starting to act as if -- because he</p> <p>18 had a lot of power, he was acting, you know, outside</p> <p>19 his power. That's what he stated that you know he</p> <p>20 turned [ph] and that's why he terminated.</p> <p>21 I didn't know who he was. I was like, why</p>	<p style="text-align: right;">Page 57</p> <p>1 They were supposed to be all scanned. I</p> <p>2 never accessed Barry's records. I never looked at</p> <p>3 them, so I can't tell you Barry's records, but</p> <p>4 everybody -- the process is everybody's record is</p> <p>5 supposed to be scanned into Decusoft as well as Vasion</p> <p>6 which is our document repository and they have a file</p> <p>7 room.</p> <p>8 We were breaking down the file room because too</p> <p>9 many people -- it was accessible to everyone and it's</p> <p>10 against HIPAA code now to have paper records. If you</p> <p>11 know anything about healthcare, they're eliminating</p> <p>12 paper records.</p> <p>13 So we was trying to bring our organization</p> <p>14 up to date to meet HIPAA guidelines and get rid of the</p> <p>15 paper -- all the paper charts.</p> <p>16 Q Okay. You mentioned two things: Decusoft</p> <p>17 and Vasion.</p> <p>18 A Vasion.</p> <p>19 Q Can you spell Vasion?</p> <p>20 A V-A-S-I-O-N. And they used to be called</p> <p>21 Maxx Vault, M-A-X-X V-A-U-L-T.</p>